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Attorneys for Defendant CoreCivic

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ATLP, a minor, by and through his Guardian
Ad Litem Tyloria Taylor; and AJB, a minor,
by and through his Guardian Ad Litem
Tyloria Taylor, and Tyloria Taylor as Co-
Special Administrator of the Estate of Brandon
Lavon Patton, Deceased,

Plaintiffs,

v.

CoreCivic, Inc., formerly Corrections
Corporation of America, a foreign corporation
d/b/a Nevada Southern Detention Center; Doe
CoreCivic Employees I through XX; Does I
through X; and Roe Entities I through X,
inclusive,

Defendants.

Case No. 2:21-cv-02072-JCM-EJY

**CORECIVIC'S UNOPPOSED
MOTION TO EXTEND TIME TO
RESPOND TO PLAINTIFFS'
PARTIAL OBJECTION TO
MAGISTRATE JUDGE
YOUCHAH'S REPORT AND
RECOMMENDATION**

(First Request)

Defendant, CoreCivic, Inc. ("CoreCivic"), moves for a three-week extension of time
to respond to Plaintiffs' Partial Objection to Magistrate Judge Youchah's Report and
Recommendation, which was filed December 19, 2023, *see* LR IA 6-1(c), from January 2,

2024 to January 23, 2024.¹ This is CoreCivic’s first request to extend its response deadline. *See* LR IA 6-1(a).

I. Relevant Procedural History

On July 26, 2023, Plaintiffs filed a Motion to Amend Complaint to add former Warden Koehn, former Health Services Administrator (“HSA”) Holley, former Chief of Unit Management (“COUM”) Sapp, Registered Nurse (“RN”) Smith, and Dr. Keith Ivens as Defendants and a negligent training and supervision claim pursuant to Rule 15. (Dkt. 77 at 5.) CoreCivic filed its Response to Plaintiffs’ Motion to Amend Complaint in opposition of their request on August 16, 2023 (*see* Dkt. 80), and Plaintiffs filed their Reply on September 7, 2023. (Dkt. 82.)

On December 5, 2023, Magistrate Judge Youchah issued a Report and Recommendation (“R&R”), recommending that the Court deny Plaintiffs’ Motion to Amend Complaint. (Dkt. 89 at 15.) Pursuant to Local Rule IB 3-2, Plaintiffs had 14 days to file objections to the R&R. (*Id.*) Plaintiffs filed their Objections on December 19, 2023. (Dkt. 91.) CoreCivic’s deadline to respond to Plaintiffs’ Objections is January 2, 2023. *See* LR IB 3-2(a) (“The deadline to file and serve any responses to objections is 14 days after service of the objection.”).

II. Legal Argument

Good cause exists to extend the time for CoreCivic to respond to Plaintiffs’ Objections. Specifically, Plaintiffs’ Objections are 16 pages in length, attach multiple exhibits, and take issue with the majority of Magistrate Judge Youchah’s R&R. (*See generally* Dkt. 91.) Due to the size of their Objections, CoreCivic requires additional time to review and analyze them in preparation of their response. CoreCivic also requires additional time to respond due to the holiday week, a pre-planned vacation, and multiple conflicting deadlines in other matters, including but not limited to, preparing pre-trial materials in the United States District Court for the Western District of Texas, *Coyoy v. CoreCivic*, No. 5:19-cv-00915-FB

¹ Prior to filing this Motion, CoreCivic conferred with Plaintiffs who do not oppose its request.

(W.D. Tex.); and preparing discovery responses in the United States District Court of the District of Colorado, *Angelo v. Wellpath, et al.*, No. 1:23-CV-01607-CNS-STV (D. Colo.). Good cause therefore exists warranting an extension of the deadline for CoreCivic to respond to Plaintiffs' Partial Objection to Magistrate Judge Youchah's Report and Recommendation.

III. Conclusion

For the foregoing reasons, CoreCivic respectfully requests that the Court extend the deadline for it to respond to Plaintiffs' Partial Objection to Magistrate Judge Youchah's Report and Recommendation from January 2, 2024 to January 23, 2024.

DATED this 29th day of December, 2023.

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

By /s/ Kristina R. Rood

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Attorneys for Defendant CoreCivic

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: January 2, 2024

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2023, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Paola Armeni parmeni@clarkhill.com
Gia N. Marina gmarina@clarkhill.com

I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

/s/ Kristina R. Rood